

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NORTH CAROLINA  
CHARLOTTE DIVISION  
CASE NO. 3:19-CV-578**

**PAUL MANOS and MARGARET  
MANOS**

**Plaintiffs**

**v.**

**FREEDOM MORTGAGE  
CORPORATION**

**Defendant.**

**OBJECTION TO BILL OF COSTS**

**COME NOW** Plaintiffs Paul and Margaret Manos, by and through counsel and hereby object to the Defendant's Bill of Costs:

1. Defendant Freedom Mortgage Corporation (Freedom) filed a Bill of Costs on June 30, 2022. (Doc 40).
2. It appears that Freedom's Bill of Costs (Doc. 40-1) requested unnecessary and duplicated items.
3. First, Freedom requests \$953.30 in process server expenses for subpoenas to third party witnesses. It is common to serve such subpoenas through registered mail or courier such as Federal Express. The total cost for service of all subpoenas should have been less than \$100 if they were all necessary.
4. Next, Freedom served Truist Financial Corporation and Equifax Information Services with two subpoenas each by two separate process servers. This is redundant and unnecessary and the Plaintiff should not be required to pay for the error the Defendant made in its first service. No party should run up costs.

5. Further, Freedom requests \$535.00 for “reporter attendant fees.” (Doc. 40-1, p.1). This is not accurate. Cady Reporting charged Freedom \$360.00 for the attendance fee. (Doc. 40-1, p.9). This is still an extravagant amount for a court reporter attendance, and Freedom should not request \$535.00 for the attendance fee when it spent \$360.00.
6. Finally, this is not the first time Freedom has made improper requests in this case. In the Fourth Circuit Freedom filed a Bill of Costs for the printing of transcripts, filing under oath that these were necessary costs.
7. At that time the Fourth Circuit’s Public Advisory Regarding Operating Procedures in Response to COVID-19 published on March 17, 2020, “suspend[ed] the requirement of paper copies of formal briefs and appendices pending further notice,” and so the Fourth Circuit denied Freedom’s Bill of Costs.
8. The Plaintiffs submit to the Court that only necessary and reasonable costs should be awarded and it was not necessary to send a process server to a corporation that has a noticing address on file with the Secretary of State and that routinely accepts notices of subpoena by mail, nor were multiple services of the subpoenas necessary.

**WHEREFORE**, Plaintiffs Paul and Margaret Manos respectfully request that the Court DENY Freedom’s Bill of Costs, or reduce the costs awarded, and for such other and further relief as this Court deems just and proper.

**TODAY** is July 28, 2022.

/s/ M. Shane Perry  
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**PAUL MANOS and MARGARET  
MANOS**

**Plaintiff-Appellants**

**v.**

**FREEDOM MORTGAGE  
CORPORATION**

**Defendant-Appellee.**

**OBJECTION TO BILL OF COSTS**

**CERTIFICATE OF SERVICE**

I hereby certify that I caused the foregoing **Objection to Bill of Costs** to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send notice of such filing to the following participants in the case who are registered CM/ECF users:

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Respectfully submitted today, July 28, 2022.

**COLLUM & PERRY**

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